

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,	)	Case No. 16-cv-1054 (WMW/DTS)
	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>Jury Trial Demanded</b>
	)	
FEDERAL INSURANCE	)	
COMPANY, an Indiana corporation	)	
and ACE AMERICAN INSURANCE	)	
COMPANY, a Pennsylvania	)	
corporation,	)	
	)	
Defendants.	)	

**STIPULATION TO ALLOW FAIR ISAAC CORPORATION TO AMEND  
INITIAL DISCLOSURES**

WHEREAS, on February 22, 2019, Fair Isaac Corporation (“FICO”) served its Third Supplemental Initial Disclosures identifying Fernando Donati Jorge, Senior Director of Product Management at FICO, as an individual with “[k]nowledge of the value of Blaze Advisor® software; knowledge regarding the authorship of the various versions of Blaze Advisor® software; knowledge of the extent of preexisting material in later versions of the Blaze Advisor® software.”

WHEREAS, Mr. Jorge has announced his intention to leave the employment of FICO, and Mr. Jorge lives outside the subpoena power of this District.

WHEREAS, the parties agree that good cause exists to allow FICO to amend its initial disclosures to substitute witnesses with knowledge of the topics for which Mr.

Jorge was identified. The parties agree that FICO has acted diligently to bringing this matter to the Court.

WHEREAS, FICO will amend its initial disclosures to identify the following witnesses:

Jean-Luc Marce Vice President, Software Engineering	Knowledge regarding the authorship of the various versions of Blaze Advisor® software; knowledge of the extent of preexisting material in later versions of the Blaze Advisor® software.
Sean Baseman Vice President, Pre-Sales Department	Knowledge of the value of Blaze Advisor® software.

WHEREAS, to alleviate any prejudice to Defendants, the parties agree that FICO will make witnesses Jean-Luc Marce and Sean Baseman available for deposition at a mutually agreeable time at the location of the witness or, at Defendants' option, by video if Defendants choose to request such depositions.

IT IS HEREBY STIPULATED, by and between the parties, through their undersigned counsel of record, that FICO may amend its initial disclosures under Federal Rule Civil Procedure 26(a)(1) to name Jean-Luc Marce and Sean Baseman as witnesses consistent with the parties' stipulation. The parties further stipulate that FICO will make Jean-Luc Marce and Sean Baseman available for deposition at a mutually agreeable time at the location of the witness or, at Defendants' option, by video if Defendants choose to request such depositions. The parties request that the Court enter an Order accordingly.

Dated: June 2, 2021

MERCHANT & GOULD P.C.

/s/Heather Kliebenstein

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